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COMPLETED

Report of the Mini-Conference on Simplifying Administrative Procedures and Regulations in Programs Affecting the Elderly

Note: The recommendations of this document are not recommendations of the 1981 White House Conference on Aging or the Department of Health and Human Services. This document was prepared for the consideration of the Conference delegates. The delegates will develop their recommendations through the processes of their national meeting in late 1981.

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Legal Barriers

The American Bar Association's Commission on Legal Problems of the Elderly sponsored a Simplification Symposium on September 27, 1980 as a White House Conference on Aging mini-conference.

One conferee, a legal services attorney, set the factual stage by describing the elderly, homebound individual's frustration at failing to obtain access to existing benefit programs, thereby facing the specter of confinement in either a nursing home or an institution. For instance, the lack of mobility may prevent an individual from obtaining the variety of services that are available only by filing a number of applications at multiple locations. Subsidized housing may be available, but the elderly person must go to the housing office to fill out a housing application. There may be homemaker services available, but the elderly individual must go to the location where the services are offered. There may be food stamps available, but that same elderly person may have to travel across town to the food stamp office to fill out yet another application.

What we offer in this report reflects a half-day symposium involving 28 of the best informed individuals in the field of aging (see appendix for list of conferees and their affiliations) and substantial staff research. This discussion was intended to explore the following:

a. Creation of a single application form for human services programs;

b. Centralization of service entry points; and

c. Standardization of hearing and appeal procedures.

SINGLE APPLICATION FORM

Many elderly individuals have multiple needs and are eligible for more than one program at any given time.[1] Development of a single purpose intake form would make the whole process much easier for the elderly individuals and would relieve the government of the burden of repeatedly collecting data from a single person. It is very important to note that this would reduce both paperwork and administration costs.

The concept of a single application form for a number of human service benefit programs is not a novel one. In Wisconsin, a single purpose application is in use, collecting information necessary to determine eligibility for four programs: Food Stamps, Aid to Families with Dependent Children (AFDC), Medical Assistance, and Supplemental Security Income. The form, which reflects the present requirements of the four statutes and their regulations, is 36 pages in length. SPAARS Project officials (see below) hope to achieve significant reductions in both the length of the application form and in its processing time.[2]

Statutory Constraints

One method of reducing both the size and complexity of a single intake form is to consolidate and simplify the various forms presently used by human service programs, without violating federal and state laws and regulations. SPAARS (Single Purpose Application with an Automatic Referral Service) began in 1974 as an effort within the Mountain Plains Federal Regional Council to research and test the feasibility of adopting a single purpose application form of reasonable length for entry into the human service delivery system. The SPAARS Project sought to do this without violating the client's right to confidentiality.

In May of 1977, SPAARS published the Legal Constraints Study: A Conceptual Approach to the Simplification of Human Service Programs, identifying the legal 'constraints' to the development of a single purpose application.[3] A variation between programs was considered a 'constraint' if it necessitated (1) requesting additional information on an

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1. Colorado SPAARS, Legal Constraints Study: A Conceptual Approach to Simplification of Human Service Programs (1977) at A-4.

2. Ibid, at A-6.

3. Ibid, at A-7.

intake form, or (2) requesting information in a different form than the majority of programs. The goal of the legal constraints study was to identify program discrepancies and ascertain the work needed to achieve uniformity of eligibility terms among benefit programs.

The study documented variations in the categories most critical in determining eligibility (client identifications, income, and resources) for Food Stamps, Supplemental Security Income, Aid to Families with Dependent Children, Title XX of the Social Security Act, Medicaid, Comprehensive Employment and Training Act (CETA), and Section 8 Low-Income Housing Assistance. A determination was then made as to which variations were purposeful in nature, i.e., involving legislative policy decisions, and which were merely the result of the regulation writing process.[4] The study found that only 15% of the constraints were based upon statutory mandates reflecting substantive policy decisions.

SPAARS concluded that the development of a single purpose application is possible. It further recommended that uniform definitions of eligibility terms be devised and made available through a central agency, such as OMB, for use by agencies in drafting regulations for social service and income maintenance programs; and that interagency coordination in program design and means, as well as the writing of regulations, be achieved.

De lopment of Common Definitions

Pursuant to their recommendation that common eligibility terms be adopted by human service programs, SPAARS initiated the Intergovernmental Eligibility Simplification Project to Investigate the feasibility of developing standard operating terms, definitions, and rules of eligibility.[5] The goal of this study was to: (1) identify differences in definitions of eligibility terms among human service programs; (2) recommend changes in laws and regulations for standardizing terms and definitions; and (3) assess the impact of the proposed changes on program participation rates and benefit levels.

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4. The study recognized the fact that variations in language may not be indicative of a variation in intent, that is, discrepancies may be due merely to the fact that multiple agencies are empowered to write regulations without any effort of coordination.

5. Colorado SPAARS, Uniform Financial Measures for Use in Determining Client Eligibility: An Impact Analysis (1980).

The Project, begun in late 1978, compiled and analyzed the federal laws and regulations defining the terms 'income' and 'resources' as factors of eligibility in the programs studies by the SPAARS Legal Constraints Study (exclusive of Medicaid). The Project developed uniform definitions for these financial need eligibility terms and examined the effects of using the newly composed definitions on participation rates and benefit levels of selected programs.

The Intergovernmental Eligibility Simplification Project concluded that it is feasible to standardize the terms governing the financial need requirements for client eligibility. By 'standardize' it is meant that the use of the same definition, valuation, and computation for each item of income and resource be applied in each of the programs so that client financial information would be treated in like manner among the service programs.

The goal of standardizing terms of eligibility is confined to language not significantly related to policy decisions as set forth by authorizing legislation. "Elderly" as a term of eligibility is an example of such a policy decision; e.g., generally speaking, individuals 62 years of age and older are entitled to Social Security benefits, while only those persons 65 years of age and older are eligible for Medicare. This distinction cannot be eliminated, and would not be included within standardization.[6]

Computerization

In addition to developing uniform terms and definitions for eligibility requirements, and selecting a single agency to devise and distribute these terms and definitions, the complexities and variations among programs that impede the development of a single application form may be ameliorated by the use of a computer system.

In order for a single form to contain the requirements of eligibility for a number of benefit programs, it necessarily becomes long and complex. A computer may be utilized to minimize the information the client is required to give on an initial intake form.

A computer may be programmed with program-specific eligibility requirements for each human benefit service. Client and intake worker would fill out an application form containing

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6. Symposium participants noted that much of the divergence in definitions from program to program reflects attempts by managers to respond to legitimate needs of current and potential program participants. A trade-off exists between simplifying and standardizing definitions on the one hand and administrative flexibility on the other. Benefits from such common definitions, however, far outweigh the loss in flexibility.

general inquiries about the client's age, health, family status, income, and resources. The computer would then be employed to make the differentiations as they exist among the various programs. For example, the client and intake worker would note whether the client owns a car; the computer would then be used to convert that information into its relevance to the food stamp program or the Medicaid program.

The computer may be employed whether or not common eligibility factors and terms are established. It may be used to differentiate between eligibility factors and terms as specified by each program's regulations, or it may be used merely to differentiate between program eligibility guidelines arrived at by way of the adopted, uniform eligibility language.

Trigger Questioning

As the computer system would minimize the number of questions necessarily contained in a single application form, so too would the use of "trigger" questioning.

As an alternative to asking a client a long list of questions about eligibility, prescribed by statutes and regulations, it may be possible to condense this highly detailed information into a few sensitive inquiries. Questions must be ordered in a way that an individual plainly ineligible for a specific program will not be forced to fill out an entire form before being apprised of the ineligibility.

For example, if a set age is a program requirement, the applicant's age should be asked immediately. If the individual is above or below the program's age specification, the form itself should direct the individual to discontinue filling out the application.

This method may lead to an eligibility determination some acceptable ratio of accuracy, as compared with the list presently employed in the separate and program-specific applications.

Single Agency Supervision

SPAARS recommended that a single agency be authorized to devise uniform definitions of eligibility terms. The terms would then be used by the various agencies in drafting their own regulations. An extension of this recommendation would be to invest one agency with the responsibility of determining eligibility for all human service programs.

When the SPAARS Project was begun, its goal was to develop an operable single application of reasonable length that

would not create confidentiality problems.[7] A single agency authorized to determine eligibility for all programs would eradicate the confidentiality issue necessarily confronted when a single application form is shared by a number of agencies.

This single eligibility agency would further the development of a single application form, whether or not it is used to develop uniform definitions and factors relating to eligibility terms. The single agency, familiar with the requirements of each human service program, could make the program-specific differentiations from an application form containing general client eligibility information.

CENTRALIZATION OF ENTRY POINT FOR SERVICES

"In a nation where the old are growing older, the full floor of services must be mandated only for those who need it most, the frail elderly (75 plus) and those who have reached functional dependence before this age. These services encompass a single point of entry (emphasis added), one place to apply and to be guaranteed accessibility to all possible services..."[8]

There is a great deal of discussion within the aging community on the issue of a single focal point for the planning and delivery of services to the elderly. The Subcommittee on Human Services of the Select Committee on Aging recommended in their report (96-226), published in May 1980, that both services and planning be decentralized.[9] They outline the following reasons for spreading services throughout a community:

1. Increases access for clients, especially those with reduced mobility;

2. Capitalizes on informal helping networks;

3. Is more responsive to clients' needs; and

4. Increases local autonomy.[10]

Congressman Pepper, on the other hand, has expressed a strong desire to have "single stop shopping for the elderly." The

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7. SPAARS, Legal Constraints Study, ibid, at A-4.

8. Future Directions for Aging Policy: A Human Services Model. (May 1980), at 96-226, III-IV.

9. Ibid, at 59.

10. Ibid, at 59.

area agency on aging may be able to function as the information and referral service. The delivery of some social services may also be offered through a senior center, while others, such as housing, may not.

Centralization of Information

The model of a senior center, which not only disseminates information about benefit programs but also serves as a meeting place for elderly citizens to participate in the community and receive a nutritious meal, might function as the least obtrusive means of gaining information about what services are available to meet an individual's specific needs. This senior center would be located at the county/community level.

Centralizing Evaluation

It should be a goal to provide a focal point where there can be a comprehensive evaluation of the individual's needs, while the delivery of services to meet those needs should be decentralized. The evaluation aspect of the benefit system may be the only function amenable to centralization on the federal level. This form of centralization would not necessarily involve a central locale; it could involve a group of workers who go out into the community to determine what the elderly individual's condition is, what problems the individual is facing, which of the multiple services most address that individual's needs, and finally, how best to link the person with needed services. This form of centralization would require evaluation workers to deal with the various service agencies, thus eliminating the need for the elderly client to deal with each independently.

HEARINGS AND APPEALS

Elaborate and complicated hearing and appeal procedures present a barrier to the elderly individual's access to needed services. Not only is the older person forced to become familiar with the vast number of potential services, along with their attendant eligibility criteria, but the individual is further required to be versed in the procedural requirements associated with each program's hearing and appeal procedures.

Standardization

The numerous benefit programs available to the elderly vary considerably in terms of what, where, and how one files an appeal, or handles a hearing. Many lawyers are less inclined to do pro bono or reduced fee work for the elderly because appeals of rulings of ineligibility often entail wading through each program's procedures and regulations.

Standardization might be achieved with respect to the time period between an agency decision and the filing of an appeal, the number and type of documents filed, and/or the manner in which a hearing is conducted. Such standardization would encourage a broader group of attorneys to accept an older person's claim, while reducing the complexity and inaccessibility of the benefit system itself.

Access

As a practical matter, the individual who has the resources with which to finance an appeal has a better chance of success in obtaining the services to which he or she feels entitled. The hearings and appeals processes may often be made more accessible and equitable simply by paying reasonable attorneys' fees for accepting the elderly individual's claim. Not only would this provide an advocate for the needy individual, but also encourage the involvement of the organized bar in such matters. Any legislative or regulatory provision to expand reimbursement for legal representation would need, of course, to take into account the rules and policies relating to rendition of legal services to disadvantaged persons under the Legal Services Corporation Act and the Older Americans Act.

It should be noted that legislation has recently been created which provides for payment of counsel fees to individuals and small businesses in adversary administrative hearing and court proceedings against the government where it is determined that the government's position was not "substantially justified" (P.L. 96-481), Small Business Act. Although implementation has not yet commenced, this would seem to hold the promise of encouraging and facilitating elderly claimants' access to appellate recourse under government benefit programs.

Of equal importance, a strong capacity on the part of the Legal Services Corporation network to assit elderly claimants with assertion of hearing and appeals rights would also encourage meaningful access for senior citizens.

RECOMMENDATIONS

By sponsoring a Simplification Symposium, the ABA Commission on Legal Problems of the Elderly and its invited guests sought to advise the White House Conference on Aging. The conferees propose and the Commission concurs with the following recommendations to simplify and coordinate the maze of conflicting programs and regulations that presently confront the nation's elderly population.

(1) A single application form should be developed for the elderly for a number of benefit programs.

(2) To aid in the development of a single application form, common definitions should be set forth for areas that are not

significantly related to policy considerations, as mandated by legislation or reasonably implied therefrom. This may be done by placing responsibility for the creation of these definitions with one agency or by giving a designated person of authority the responsibility for coordination.

(3) It should be a goal to provide a focal point where there can be a comprehensive evaluation of the individual's need, while the delivery of services to meet these needs should be decentralized. The variety of resources available to the elderly community, bounded by the scarcity of these resources, necessitates the utilization of centralized assessment criteria. The delivery of services must remain as local and diverse as the community service center or neighborhood church.

(4) The hearings and appeals procedures of the various benefit programs should be made as similar as possible. They might also be made more accessible by providing for government payment of reasonable attorneys' fees or expanded legal services capacity for representation of the elderly in such matters.

APPENDICES

A. Conferees

B. Federal Responsibility to the Elderly: Chart of Federal Programs Benefiting the Elderly

C. SPAARS Fact Sheet

D. SPAARS Executive Summary

E. SPAARS Table of Statutory and/or Regulatory Changes Needed to Standardize

SIMPLIFICATION SYMPOSIUM CONFEREES

Invited Guests	Affiliation
Craig Baab	ABA Government Relations Office, responsible for monitoring regulatory reform efforts
Bob Blancato	Staff director, subcommittee on Human Services, House Select Committee on Aging; responsible for drafting Future Directions for Aging Policy: A Human Service Model
Sandy Boettcher	Hogan and Hartson; responsible for the firm's pro bono Food Stamp cases
Carlile Bolton-Smith	Retired, Social Security Administration's Office of Hearings and Appeals
Peter Conroy	Minority staff director, Subcommittee on Human Services, House Select Committee on Aging
Congressman Robert Drinan	Member, House Select Committee on Aging
Irwin Kirk	Chairman, SPAARS Committee, Department of Education, Colorado
Elliot Minceberg	ABA Section on Individual Rights and Responsibilities, Committee on Administrative Law
Bernard Nash	White House Conference staff; former executive director, American Association for Retired Persons, National Retired Teachers Association
Nell Ryan	Senate Special Committee on Aging
Robert Sermier	Department of Health and Human Services; Deputy Director for the President's Eligibility Simplification Project
Richard Swenson	Community Services Administration Regional Office, Denver; vice-chairman, SPAARS Committee

James Sykes	Member, Federal Council on Aging; member, Advisory Committee, White House Conference on Aging; chair, Public Policy Committee, National Council on the Aging; runs local aging program
Jerry Tarutis	Evergreen Legal Services; ABA Administrative Law Section

Commissioners, American Bar Association
Commission on Legal Problems of the Elderly

Lyman M. Tondel, Jr.	Commission chairman; partner, Cleary, Gottlieb, Steen & Hamilton
George J. Alexander	Dean, University of Santa Clara School of Law; chairperson, Family Law Section on the Elderly
Betty J. Capps	Consultant on Aging; formerly Administrative Officer, Divisions of Aging and Long Term Care for Colorado
Edward F. Howard	Member, Commission's Simplification Subcommittee; counsel, National Council on the Aging; formerly counsel, House Select Committee on Aging, oversight responsibility for programs and issues affecting the elderly
Esther F. Lardent	Director, Volunteer Lawyer's Project, Boston, MA; trainer for volunteer attorneys in legal issues affecting the elderly
F. Peter Libassi	Verner, Liipfert, Bernhard & McPherson; former general counsel for the Department of Health, Education and Welfare, responsible for drafting regulations affecting the elderly
Paul F. Nathanson	Chairperson, Commission's Simplification Subcommittee; professor, University of New Mexico Law Center; clinical coordinator for elderly programs; former director, National Senior Citizens Law Center, the Legal Services Corporation and Administration on

	Aging's back-up center for elderly litigation and legislation, nationwide
John J. Regan	Dean, Hofstra Law School; extensive research and writing on programs affecting the frail elderly
Daniel Skoler	Deputy Director, Social Security Administration Bureau of Hearings and Appeals, responsible for implementing programs affecting the elderly; responsible for drafting junvenile standards; former director, ABA Public Service Division
Fernando Torres-Gil	Professor, Andrus Gerontology Center, University of Southern California; former special assistant to Secretary of the Department of Health, Education and Welfare; former White House Fellow
Erica F. Wood	Former staff attorney, Legal Research and Services for the Elderly; former chairperson, Young Lawyers Division on the Elderly

Other Conferees

Nancy Coleman	Staff Director, ABA Commission on Legal Problems of the Elderly; former investigator with Senate Special Committee on Aging
Ina Coven	Commission legal intern
Bonnie Fought	Commission intern

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FEDERAL RESPONSIBILITY TO THE ELDERLY

(Executive Programs and Legislative Jurisdiction)

CHARTS COMPILED BY THE CONGRESSIONAL
RESEARCH SERVICE OF THE
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FOR THE

SELECT COMMITTEE ON AGING
HOUSE OF REPRESENTATIVES
NINETY-FIFTH CONGRESS
SECOND SESSION

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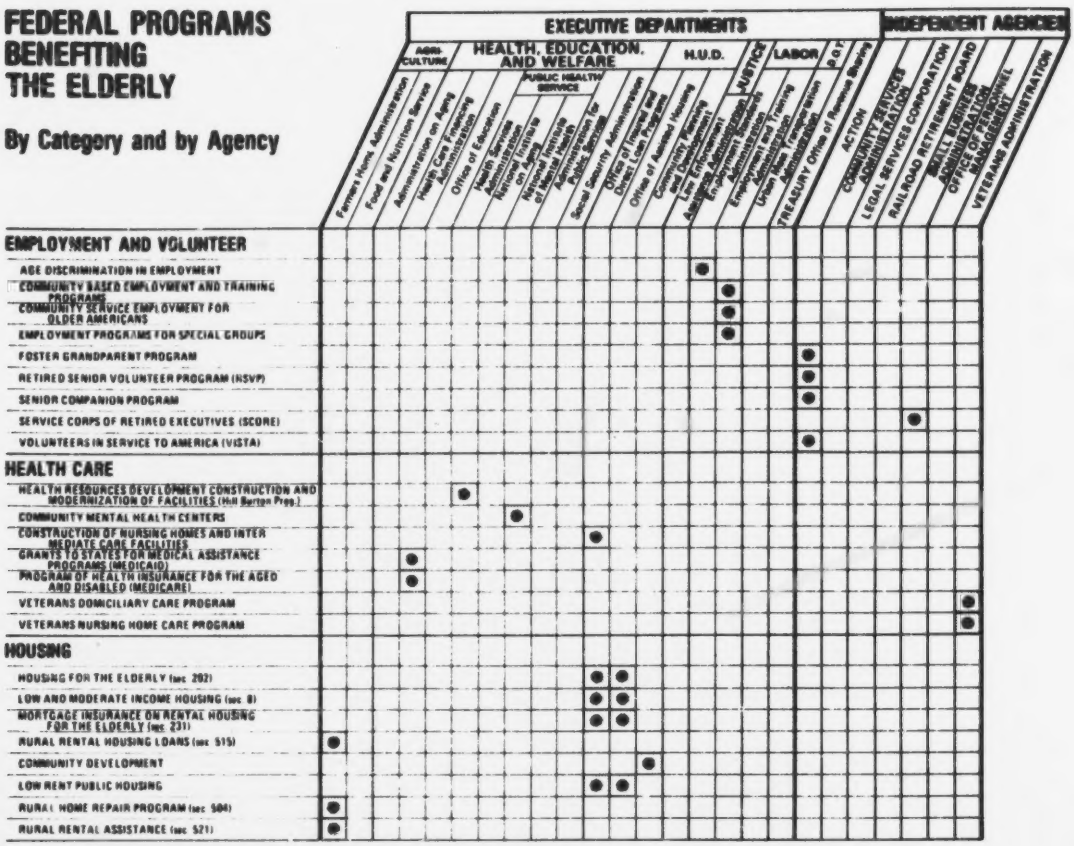
FEDERAL PROGRAMS BENEFITING THE ELDERLY

By Category and by Agency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R.S.T.
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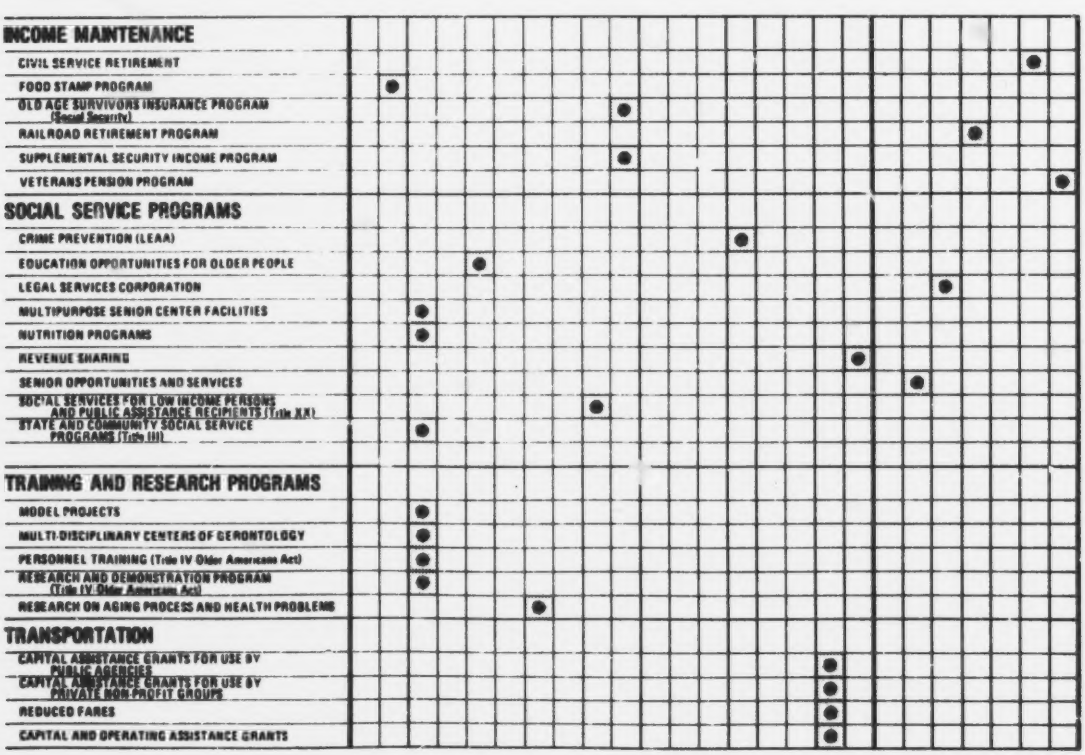
Food and Nutrition Service
Administration on Aging
Health Care Financing Administration
Office of Education
Health Service Administration
National Institute on Aging
National Institute of Mental Health
Administration for Public Services
Social Security Administration
Office of Human and Public Affairs
Office of Assisted Housing
Community Planning and Development
Law Enforcement Assistance Administration
Employment Standards Administration
Employment and Training Administration
Urban Mass Transportation Administration
TREASURY Office of Revenue Sharing
ACTION
COMMUNITY SERVICES ADMINISTRATION
LEGAL SERVICES CORPORATION
RAILROAD RETIREMENT BOARD
SKILL SERVICES ADMINISTRATION
OFFICE OF PERSONNEL MANAGEMENT
VETERANS ADMINISTRATION
EMPLOYMENT AND VOLUNTEER
AGE DISCRIMINATION IN EMPLOYMENT
COMMUNITY BASED EMPLOYMENT AND TRAINING PROGRAMS
COMMUNITY SERVICE EMPLOYMENT FOR OLDER AMERICANS
EMPLOYMENT PROGRAMS FOR SPECIAL GROUPS
FOSTER GRANDPARENT PROGRAM
RETIRED SENIOR VOLUNTEER PROGRAM (RSVP)
SENIOR COMPANION PROGRAM
SERVICE CORPS OF RETIRED EXECUTIVES (SCORE)
VOLUNTEERS IN SERVICE TO AMERICA (VISTA)
HEALTH CARE
HEALTH RESOURCES DEVELOPMENT CONSTRUCTION AND MODERNIZATION OF FACILITIES (Hill Burton Prog.)
COMMUNITY MENTAL HEALTH CENTERS
CONSTRUCTION OF NURSING HOMES AND INTER MEDIATE CARE FACILITIES
GRANTS TO STATES FOR MEDICAL ASSISTANCE PROGRAMS (MEDICAID)
PROGRAM OF HEALTH INSURANCE FOR THE AGED AND DISABLED (MEDICARE)
VETERANS DOMICILIARY CARE PROGRAM
VETERANS NURSING HOME CARE PROGRAM
HOUSING
HOUSING FOR THE ELDERLY (sec 202)
LOW AND MODERATE INCOME HOUSING (sec 8)
MORTGAGE INSURANCE ON RENTAL HOUSING FOR THE ELDERLY (sec 231)
RURAL RENTAL HOUSING LOANS (sec 515)
COMMUNITY DEVELOPMENT
LOW RENT PUBLIC HOUSING
RURAL HOME REPAIR PROGRAM (sec 504)
RURAL RENTAL ASSISTANCE (sec 521)


INCOME MAINTENANCE
CIVIL SERVICE RETIREMENT
FOOD STAMP PROGRAM
OLD AGE SURVIVORS INSURANCE PROGRAM (Social Security)
RAILROAD RETIREMENT PROGRAM
SUPPLEMENTAL SECURITY INCOME PROGRAM
VETERANS PENSION PROGRAM
SOCIAL SERVICE PROGRAMS
CRIME PREVENTION (LEAA)
EDUCATION OPPORTUNITIES FOR OLDER PEOPLE
LEGAL SERVICES CORPORATION
MULTIPURPOSE SENIOR CENTER FACILITIES
NUTRITION PROGRAMS
REVENUE SHARING
SENIOR OPPORTUNITIES AND SERVICES
SOCIAL SERVICES FOR LOW INCOME PERSONS AND PUBLIC ASSISTANCE RECIPIENTS (Title XX)
STATE AND COMMUNITY SOCIAL SERVICE PROGRAMS (Title III)
TRAINING AND RESEARCH PROGRAMS
MODEL PROJECTS
MULTI-DISCIPLINARY CENTERS OF GERONTOLOGY
PERSONNEL TRAINING (Title IV Older Americans Act)
RESEARCH AND DEMONSTRATION PROGRAM (Title IV Older Americans Act)
RESEARCH ON AGING PROCESS AND HEALTH PROBLEMS
TRANSPORTATION
CAPITAL ASSISTANCE GRANTS FOR USE BY PUBLIC AGENCIES
CAPITAL ASSISTANCE GRANTS FOR USE BY PRIVATE NON-PROFIT GROUPS
REDUCED FARES
CAPITAL AND OPERATING ASSISTANCE GRANTS

SOURCE.—"Federal Responsibility to the Elderly," Select Committee on Aging print (Pub. No. 95–167), January, 1979.

MOUNTAIN PLAINS FEDERAL REGIONAL COUNCIL
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SPAARS FACT SHEET

SPAARS (Single Purpose Application with Automatic Referral System) is an intergovernmental project exploring the feasibility and impact of a single purpose application for entry into the human services delivery system. The SPAARS goal is to facilitate the delivery of services to all clients legally qualified to receive such services by making the application process simpler and the referral easier. Development of a standard application would avoid the frustration and time consuming effort for the client to obtain the services needed.

SPAARS in a joint effort of the states of Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming with an inter-departmental group from the Mountain Plains Federal Regional Council (Region VIII), Denver, Colorado. The states of Massachusetts and Michigan joined SPAARS for the intergovernmental Eligibility Simplification project.

SPAARS was initiated to address the situation resulting when governments respond to the needs of the old, young, sick, blind, unemployed, and poor by enacting a variety of legislative remedies. This legislation has resulted in a number of complex policies, procedures and data processing systems. The increased complexity has created heavy administrative burdens and caused frustration among recipients, administrators, and the general public.

SPAARS Results

1. Single Purpose Application Colorado, Utah, Montana, and Wyoming each produced a standard application form by compiling common items of information requested of an applicatn form existing forms. Approximately 70% of the information called for in these existing application forms was uniform. The remainder was not common: either for unique program purposes or because essentially the same information was requested in a slightly different form. As a result of this analysis the Legal Constraints study was begun.

2. Legal Constraints study the Colorado and Federal teams completed a study to analyze the legal constraints imposed by Federal statutes and regulations to a standard application. Statutes and regulations for the Food Stamps, AFDC, Title XX, SSI, CETA, and Section 8 Housing Assistance programs were compared to determine the consistences and inconsistences in the treatment of financial need, ("income" and "resources") eligibility requirements. To resolve the inconsistencies language was proposed to revise the statutes and regulations. Statutes and regulations as of February, 1977 were the basis for this report.

3. Intergovernmental Eligibility Simplification project This project is a study to develop uniform measures for determining client financial need eligibility among human service programs. Changes are recommended in federal statutes and regulations to standardize the financial need requirements. An assessment is

is then made as to the likely impact of these changes on client program participation. The study reflects recent legislative and regulatory changes as of February 1980. The study concludes that standardization is feasible with most of the changes having miminal impact upon client participation and program benefit payments. Work on this project has been shared with the inter-departmental eligibility simplification project initiated by President Carter for the Department of Health and Human Services, Housing and Urban Development, Agriculture, Loabor, and the Community Services Administration and the Office of Management and Budget. This initative is co-chaired by HHS Secretary Parircia Harris and OMB Director James McIntyre.

Other SPAARS Results

1. A client pathway analysis was completed by South Dakota and Colorado to identify for each of the six above programs each event which occurs in the client eligibility determination process from the time the applicant files the application form to the final eligibility determination. All forms used in the process were identified.

2. Tie-Line was established in South Dakota as a state-wide and toll-free telephone information and referral system. Tie-Line operates by enabling a citizen to telephone the Tie-Line operator in the state capitol and discuss the citizen's need or problem with the Tie-Line operator who then consults a data base of public and private service providers. The Tie-Line operator then telephones the appropriate service provider treated closest to the caller and then bridges the caller with the service provider. The Tie-Line operator remains on the line long enough to assure that a proper linkage was make.

EXECUTIVE SUMMARY

Uniform Financial Measures For Use In Determining Client Eligibility Among Human Service Programs: An Impact Analysis is a remedy to solving administrative problems experienced by state and local governments in delivering human services. The study, which focuses on one element of the structure of human service programs (i.e., the client eligibility determination process and the development of ways to simplify Federal eligibility requirements) outlines a systematic approach to making the human service delivery system more efficient, effective and equitable. Through this study, national government is provided with a framework for developing national policy regarding the income and resources of individuals and families in need. The study proposes a comprehensive set of language that (1) provides for uniform, national definitions of income and resources and (2) provides for uniform policies regarding the process used in human service programs for valuing and treating the income and resources of persons in need. While the language proposed necessitates changes in program laws and regulations, such changes are necessary if government is to respond effectively to state and local governments, taxpayers, and clients.

Study Overview

The study of Federal eligibility requirements indicates it is possible to achieve uniformity and consistency among the various sets of definitions that exist among human service programs. This study focuses exclusively on the development of uniform language to define the terms income and resources. The study compares and identifies the differences that presently exist among definitions of income and resources as cited in the laws and regulations of six programs: Food Stamps, Supplemental Security Income (SSI), Aid to Families with Dependent Children (AFDC), Title XX of the Social Security Act, Comprehensive Employment and Training Act (CETA), and Section 8 Low-Income Housing Assistance. The study further examines the effects of using uniform definitions of income and resources to determine client eligibility on the participation rates and benefit levels of selected programs. Based on this preliminary assessment, it appears that the use of uniform measures to determine income and resources would not create significant changes in the number of persons deemed eligible for program benefits, nor would benefit levels of current recipients be altered significantly.

Funded by the Community Services Administration, the study represents a joint activity of the States of Colorado, Massachusetts, Michigan, and South Dakota in conjunction with the Mountain Plains Federal Regional Council, Region VIII.

Recommendations

Outlined in this study are specific recommendations for defining, valuing, and treating each type of income and resources identified in the course of analysis. In order that uniformity among federal definitions of income and resources be achieved and methods used by states to deliver human services be streamlined and simplified, the following actions are recommended:

1. That the Department of Health and Human Services, Housing and Urban Development, Labor and Agriculture in conjunction with the Office of Management and Budget develop a federal policy which provides for the use of uniform standards for evaluating and treating the personal finances of individuals and families applying to social and economic programs.

2. That the proposed changes and recommendations cited in this document be utilized and considered in the course of formulating such federal policy.

3. That such federal policy be used as guidance for departments and agencies in issuing federal regulations.

4. That the Office of Management and Budget assume the responsibility to review regulations issued by federal departments and agencies in order to assure compliance with such federal policy.

5. That the Office of Management and Budget require all legislative proposals submitted by the President to the Congress comply with measures delineated in such federal policy.

6. That the Department of Health and Human Services, Housing and Urban Development, Labor, and Agriculture in conjunction with the Office of Management and Budget begin developmental work toward the design and development of a comprehensive data system which provides useful and consistent information regarding the characteristics of populations of social and economic programs.

TABLE II

Statutory and/or Regulatory Changes Needed to Standardize

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
1. Income from Employment	A	A*	A	A	B	A
2. Net Income from self-employment	B	B*	B	B	B	B
3. Military Pay	A	A	A	A	A	B
4. Earinings of a child/student	B*	B*	B*	B	A	A
5. Unemployment Compensation	A	A	A	A	B	A
6. Worker's Compensation	A	A	A	A	A	A
7. Strike Benefits	A	A	A	A	A	A
8. Veterans' Compensation	A	A	A	A	B	B
9. Retirement Benefits	A	A	A	A	A,B	A,B
10. Social Security Benefits	B	B	B	B	B	B
11. Disability Benefits	A	A	A	A	A	A
12. Educational Benefits	B*	B*	B	B	B	B
13. Loans	B*	A	B	N/A	A	A
14. Refunds	A	B*	A	N/A	N/A	A
15. Third Party Payments	B	B	A	A	A	A
16. In-kind Income	A	B*	A	A	B	A

A=Language change; no change in substantive policy
B=Language and substantive policy change
N/A= not applicable

* refers to a change in both statute and regulation Items without an asterisk indicates the change is

TABLE II

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
17. Support Payments	A	B*	A	A	B	A
18. Alimony Payments	A	B*	A	A	A	A
19. Foster Care Payments	A	A	A	A	A	A
20. Irregular Income	B*	B*	N/A	N/A	N/A	B*
21. Prizes, Gifts, Awards	A	A*	A	B	A	A
22. Annuities	A	A	A	A	A	A
23. Inheritances/ Trusts/Estates	A	A	A	A	A	A
24. Proceeds from Insurance Payments	B	B	A	A	A	A
25. Royalties	A	A	A	A	A	A
26. Dividends and Interest	A	A	A	A	A	A
27. Income from Rents	B	B*	A	A	A	A
28. Income from the Sale of Property	A	A	A	N/A	N/A	A
29. Home Produce	A	A	A	A	A	A
30. Pensions	A	A	A	A	A	A

TABLE II

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
31. Assistance Payments from Government Programs/ Payments Provided by other Federal Statutes						
a. WIC	A	A	A	A	A	A
b. Benefits under the Uniform Relocation Assistance and Real Property Acquisitions Policy Act	A	A	A	A	A	A
c. Earned Income Tax Credit	B	B	B	B	B	B
d. Payments under the Youth Incentive Entitlement Project, and Title IV, CETA	B	B	B	B	B	B
e. Value of the Food Stamp Coupon allotment	N/A	A	A	A	A	N/A
f. Benefits under the National School Lunch Act	N/A	A	A	A	N/A	N/A
g. Benefits under the child Nutrition Act	N/A	A	A	A	N/A	N/A

TABLE II

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
h. Grants or loans made to an Undergraduate Student under programs administered by the Commissioner of Education	A	B	B	B	A	A
i. Incentive Allowances under Title I, CETA	A	B	B	B	B	B
j. Benefits under Title VIII, Nutrition Program for the Elderly	N/A	B	B	N/A	N/A	N/A
k. Value of USDA donated foods	N/A	A	A	A	N/A	N/A
l. Public assistance or Welfare Payments	A	A	A	A	B	A
m. Payments under the Trade Readjustment Act				..	B	
n. Payments under the Disaster Relief Assistance Act	B	B	B	B	B	B
o. State Payments based on age and Duration of residence	A	B	A	A	A	A

TABLE II

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
p. Payments under the Alaska Natives claims Settlement Act	B	B	B	B	B	B
q. Payments under P.L.94-114 and P.L.94-189 (payments to Indain tribes)	B	B	B	B	B	B
r. Soil Bank Payments					B	
s. Agricultural Crop Stabilization payments					B	
t. Benefits under the Crisis Intervention Program	B					
u. Indian Lands	A	A	A	A	A	A
v. Payments under P.L.94-540 to the Grand River Band of Ottowa Indians	B	B	B	B	B	B
w. Amount of the Supplementary Medical Insurance Prenium under Title XVIII of the Social Security Act						

TABLE II

Programs / Category or Item	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
x. Payments to the Blackfeet and Gros Ventre Tribes	B	B	B	B	B	B
y. Indian per capita Payments under P.L. 93-134	B	B	B	B	B	B
z. Value of Housing assistance under P.L. 93-375	B	B	B	B	B	B
aa. Value of advice, counseling consultation, training	N/A	A	N/A	N/A	N/A	N/A
bb. First $%5 of Earned Income	N/A	N/A	B	N/A	N/A	N/A
cc. Training incentives Section 632 Title IV, Social Security Act	B	B	B	B	B	B
dd. Reimbursements	A	B	B	B	B	B
ee. Payments made to volunteers under the Domestic Volunteer Services Act						

TABLE II

Category or Item \ Programs	Food Stamps	SSI	AFDC	Title XX	CETA	Section 8 Housing
1. Cash on Hand	A**	A**	A**	N/A	N/A	A
2. Checking Accts	A**	A**	A**	N/A	N/A	A
3. Savings Accts	A**	A**	A**	A	N/A	A
4. Stocks, Bonds	A**	A**	A**	N/A	N/A	A
5. Mutual Fund Shares	A**	A**	A**	N/A	N/A	A
6. Promissory Notes and Mortgages	A**	A**	A**	N/A	N/A	A
7. Income Producing Property	A**	A**	A**	N/A	N/A	A
8. Motor Vehicles	B*	B*	B*	N/A	N/A	A
9. Home	B*	B*	B*	N/A	N/A	N/A
10. Household Goods and Personal Effects	B*	B*	B*	N/A	N/A	A
11. Life Insurance Policies	B*	B*	B*	N/A	N/A	A

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Mini-Conferences have been recognized by the 1981 White House Conference on Aging and convened by organizations that wished to focus attention on special aging issues.

Recommendations of mini-conferences are not the recommendations of the official delegates to the Conference or the U.S. Department of Health and Human Services. They represent the views of the participants in the mini-conferences. They are being made available to the delegates as part of their background materials for the national conference.

The following Mini-Conference Reports have been published:

Recreation, Leisure and Physical Fitness
Aging and Alcoholism
Energy Equity and the Elderly
Public/Voluntary Collaboration: A Partnership in contributing to independent living for the aging
National Health Security
Concerns of Low-Income Elderly
Vision and Aging
Alzheimer's Disease
Arts, the Humanities and the Older Americans
Older Women
Life-Long Learning for Self-Sufficiency
The Urban Elderly
Rural Aging
Long-Term Care
Non/Services Approaches to Problems of the Aged
Spiritual and Ethical Value System Concerns
Transportation for the Aging
American Indian/Alaskan Native Elderly
Pacific/Asian Elderly "Pacific/Asians: The Widsom of Age"
Environment and Older Americans
Rights of the Institutionalized Elderly and the Role of the Volunteer
Veterans
Mental Health of Older Americans
Saving for Retirement
Hispanic Aging
Challenging Age Stereotypes in the Media
Oral Health Care Needs of the Elderly
Housing for the Elderly
Consumer Problems of Older Americans
Senior Centers
Elderly Hearing Impaired People
Black Aged
Legal Services for the Elderly
Simplifying Administrative Procedures and Regulations in Programs Affecting the Elderly
Intergenerational Cooperation and Exchange
Self-Help and Senior Advocacy
Euro-American Elderly
Inter-relationship of Government, Private Foundations, Corporate Grant-Makers and Unions
"The National Dialogue for the Business Sector"
Foot Health and Aging
Pacific Islanders Jurisdiction
Gerontological Nursing